

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WISCONSIN

EDGEWOOD HIGH SCHOOL OF THE
SACRED HEART, INC.,

Case No. 3:21-cv-00118-wmc

Plaintiff,

v.

CITY OF MADISON, WISCONSIN, *et al.*,

Defendants.

**PLAINTIFF EDGEWOOD HIGH SCHOOL OF THE SACRED HEART, INC.'S
MOTIONS TO COMPEL, TO ADJOURN TRIAL, AND TO EXTEND DISCOVERY**

Plaintiff Edgewood High School of the Sacred Heart, Inc. ("EHS") respectfully moves the Court for an Order compelling Defendants in the above-captioned matter to produce highly relevant email discovery related to key issues in this case. As explained in EHS's memorandum in support, the City of Madison has produced few, if any, emails, from key City representatives discussing the key factual issues in the case during the most relevant time period. A recent production of emails two weeks before the close of discovery demonstrates that such responsive documents likely exist but were not captured through the City of Madison's electronic search efforts. As EHS's self-help efforts with Defendants have failed, and the discovery deadline and the final pretrial deadlines are rapidly approaching, EHS respectfully requests this Court order relief to allow the full and fair discovery of relevant evidence in this case.

These Motions are supported by EHS's Memorandum of Law and the accompanying Declaration of Jonathan R. Ingrisano.

Dated: August 25, 2022

Respectfully submitted,

GODFREY & KAHN, S.C.

s/Jonathan R. Ingrisano

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